



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert Fritts, Treasurer
Brooke Holdings Inc. and Jackson
National Life Insurance Company
Separate Segregated Fund
5901 Executive Drive
Lansing, MI 48911

MAY 24 2000

Identification Number: C00254953

Reference: April Monthly Report (3/1/99-3/31/99)

Dear Mr. Fritts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The total listed on Line 28(b), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

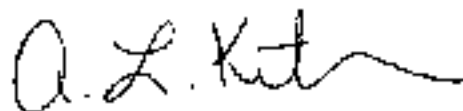
-Please amend Schedule B supporting Line 23 by providing the state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule B supporting Line 23 discloses contributions to federal candidates for which no election designation has been provided. Please note that if no designation is included in your report, the contributions will

be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. L. Kitchen".

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		Use separate worksheets for each category of the Common Reporting Page		PAGE	OF
Contributions from Individuals						FOR LINE NUMBER	11(a)(3)
Any information shown from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for any other purpose other than using the name and address of any political committee to which contributions from such committee.							
NAME OF COMMITTEE (on file)							
National Organization PAC 000000001							
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)		Amount of Last Payroll Deduction	
Anne Sullivan 81 18th Street City, State ZIP		National Organization, Inc.		payroll deductions		\$90.00	
Report For <input type="checkbox"/> One Report <input type="checkbox"/> Primary <input type="checkbox"/> Secondary		Occupation: Branch Manager		\$88.00		(\$18 biweekly)	
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)		Amount of Last Payroll Deduction	
Rodney Jones 881 Hainsbury Road City, State ZIP		National Organization, Inc.		payroll deductions		\$120.00	
Report For <input type="checkbox"/> One Report <input type="checkbox"/> Primary <input type="checkbox"/> Secondary		Occupation: Vice President		\$80.00		(\$40 biweekly)	
Date Received		Appropriate Verification		8			

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.B(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

